## CORRECTED EXHIBIT B TO MOTION

## DECLARATION UNDER PENALTY OF PERJURY

- I, David Hough, have personal knowledge of the facts set forth below and if called to testify about them, I would do so competently.
  - 1. In or around August of 2022, a representative of Wealth Assistants named Mack McKaughan told me that Wealth Assistants projected that if it managed an online store for me, the online store would generate \$10,000 of income per month by the end of the store's first year.
  - 2. In or around August of 2022, after receiving the communication from McKaughan, I signed a contract to purchase the business opportunity Wealth Assistants was offering. The terms of the contract obligated Wealth Assistants to manage an online store to provide me with income. The contract also included a "buy back" clause in which Wealth Assistants promised to buy back the online store from me if the store was not generating a profit after a set period of time.
  - 3. In or around August of 2022, I paid \$55,000 to Wealth Assistants as the onboarding fee for the business opportunity I was purchasing.
  - 4. I later paid approximately \$10,000 to Wealth Assistants for inventory for my store.
  - 5. In total, to date, I have received less than \$4,000 in connection with the business opportunity I purchased from Wealth Assistants, which includes any revenue from any stores that Wealth Assistants managed on my behalf.
  - 6. Wealth Assistants has not bought back my online store.
  - 7. I am in substantial credit card debt because of the money I lost to Wealth Assistants.

I declare under the penalty of perjury under the laws of the State of California, and under the penalty of all perjury laws of all other states in the United States, that the foregoing is true and correct.

Date: 27/03/2024

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## 2023.03.20 Hough declaration

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